

SEP 11 1992

Ms. Christina Purcell
Case Manager
Bureau of Federal Case Management
New Jersey Department of Environmental Protection
401 East State Street, CN 028
Trenton, NJ 08625-0028

Re: Revised Feasibility Study Report for the L. E. Carpenter
Company (aka Dayco Corporation) Site in Wharton, NJ

Dear Ms. Purcell:

The purpose of this letter is to provide you with the Environmental Protection Agency (EPA) comments that I have received on the revised (July 1992) Feasibility Study Report for the L. E. Carpenter Company Site. The following documents are enclosed:

Enclosure 1 - The August 28, 1992 memo from William Lawler of EPA's Environmental Impacts Branch

Enclosure 2 - The September 1, 1992 memo from Andrew Bellina of EPA's Hazardous Waste Facilities Branch

Enclosure 3 - The September 1, 1992 memo from Peter Belmonte of EPA's Air Programs Branch

Enclosure 4 - The September 10, 1992 memo from Dore LaPosta of EPA's Drinking/Ground Water Protection Branch

I also wish to make several clarifications regarding the enclosed comments:

1. The enclosures list many cleanup standards, some of which may not be mentioned in the revised Feasibility Study (FS) report. I don't believe that such omissions necessarily require another revision of FS report, as long all appropriate the cleanup standards are included in the Record of Decision and are adequately supported by the administrative record.
2. Based on my discussions with Mr. Belmonte, I understand that the estimation of VOC emissions mentioned in his September 1, 1992 memo (Enclosure 3) need not be done in the FS. Control of VOC emissions can be analyzed during at remedial design stage of work.

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3. Comment 1 of the September 1, 1992 memo from Hazardous Waste Facilities Branch refers to certain RCRA requirements as "applicable." However, it's not clear that the solvents in the soil result from the presence of listed RCRA wastes. If listed RCRA wastes are present, the groundwater treatment system may need a RCRA permit. However, if the RCRA standards are not applicable, but are relevant and appropriate, no RCRA permit would be needed.

Comments 4 and 5 of the Page 2 of the September 1, 1992 memo from Hazardous Waste Facilities Branch (Enclosure 2) refer to "OSWER Off-site Policy Directive Number 9834.11." That directive sets criteria for the selection of off-site facilities to receive hazardous substances resulting from CERCLA response actions (i.e., actions taken under the funding authority or the enforcement authority of the Superfund law). If the selected remedy is implemented solely under State enforcement authority, the use of the off-site policy directive may not be mandatory.

Comment 4 also refers to OSWER Directive 9234.1-06 (copy enclosed). In my opinion, this directive does not require that the reinjected groundwater meet drinking water standards prior to each reinjection. It does require that the reinjected groundwater be treated to "substantially reduce hazardous constituents prior to each reinjection." What constitutes a substantial reduction is to be determined on a case-by-case basis. There is no question that the ultimate goal of the groundwater remediation at the site is to attain drinking water standards. However, a very high level of groundwater treatment during the initial stages of groundwater remediation might actually reduce the rate of in situ bioremediation by removing needed biomass from the reinjected groundwater. Therefore, alternative reinjection standards (other than drinking water MCLs) might be allowed initially.

Please contact me at 212 264-8098 if you wish to discuss this matter.

Sincerely yours,

Jonathan Josephs, Project Manager
New Jersey Superfund Branch II
Emergency and Remedial Response Division

Enclosures

bcc: P. Belmonte, ACB
W. Lawler, EIB
A. Bellina, HWFB
D. LaPosta, DGWPB